



BELLEVUE GOLD

Human Rights Policy

1. INTRODUCTION

Bellevue Gold Limited (**Company**) recognises the inherent, equal and inalienable rights of all people to freedom, justice and peace. The Company seeks to continually improve its processes and practices to protect human rights and, ultimately, eliminate modern slavery within our operations and supply chains. This policy outlines the Company's commitment to seek to identify, reduce and ultimately prevent abuses of human rights (including modern slavery) from occurring in our operations and supply chain. The Company is committed to implementing policies and procedures that meet our legal and ethical obligations.

2. HUMAN RIGHTS

Human rights are freedoms and rights based on political, civil, economic, labour, social and cultural aspects of which all people are entitled, without discrimination.

The Company is committed to respecting internationally recognised human rights declarations such as the *1948 Universal Declaration of Human Rights* (**Universal Declaration**).

The Company is also committed to upholding the principles of the [UN Global Compact](#), including human rights.

The Company respects the *UN Guiding Principles on Business and Human Rights* and the *UN Voluntary Principles on Security and Human Rights*, in so far as they require businesses to respect internationally recognised human rights. The Company will strive to meet these principles, especially on the prohibition of modern slavery. Specific rights at work are outlined in the *International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work*.

In line with the Company's PACE core values, the Company will be guided by the following human rights principles:

- Strive to ensure a direct, honest and open relationship with employees and contractors that is built on mutual trust and respecting the dignity of each individual;
- Respect human rights across our operations and the Company's business relationships to engage with its stakeholders to promote human rights;
- Recognise and respect the cultural values, beliefs and traditions of the communities in which it operates including Traditional Owners in line with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP);
- Communicate the Human Rights Policy to our staff through training and to relevant stakeholders;
- Assess the human rights risks in our operations and supply chain through ongoing human rights due diligence processes;
- Comply with all relevant laws, such as reporting disclosures under the *Modern Slavery Act 2018* (Cth) and all relevant human rights laws that are applicable to the Company; and
- Embed our principles on human rights within multiple policy documents including those that are related to the health and safety of our employees, employment conditions, equality, diversity, security, environmental management and stakeholder engagement.

3. MODERN SLAVERY

The Company recognises that modern slavery is a world-wide issue which can be unknowingly intertwined in our operations and supply chain.

The *Modern Slavery Act 2018* (Cth) is a reporting mechanism for entities with a consolidated revenue over A\$100m.

The *Modern Slavery Act 2018* (Cth) defines modern slavery to include eight types of serious exploitation:

- trafficking in persons;
- slavery;
- servitude;
- forced marriage;
- forced labour;
- debt bondage;
- deceptive recruiting for labour or services; and
- the worst forms of child labour. (The worst forms of child labour are defined as situations where children are subjected to slavery or similar practices or engaged in hazardous work).

The Company will publish a Modern Slavery Statement in line with its statutory obligation.

4. WORKING WITH BUSINESS PARTNERS

The Company aspires to maximise the benefits that our operations, expenditure, taxes paid, donations and supply chain involvement can contribute to advancing the United Nations Sustainable Development Goals (SDGs) and minimise any of our adverse impacts.

The Company aims to work with its suppliers and contractors to prevent, identify and remedy incidents of human rights abuses and modern slavery risks. The Company welcomes open and

honest dialogue with its suppliers and contractors to address any incidents of human rights abuses or modern slavery risks.

The Company recognises the limits on its ability to influence or control the conduct of third parties. To the extent it is reasonably practicable to do so, the Company will endeavour to work with its suppliers and contractors to prevent, identify and (where practicable) remedy incidents of human rights abuses and modern slavery risks. The Company welcomes open and honest dialogue with its suppliers and contractors to address any incidents of human rights abuses or modern slavery risks.

The Company's suppliers and contractors may report any concerns relating to modern slavery throughout the Company's operations or supply chain via the Company's independent whistleblower hotline (refer to the Company's Whistleblower Policy for contact details) or otherwise in accordance with the Company's Whistleblower Policy.

The Company recognises that human rights abuses often go hand-in-hand with bribery and corruption. Corrupt conduct permits human rights violations to occur. To assist with eliminating human rights abuses, the Company has a zero-tolerance approach to bribery and corruption (as detailed in the *Anti-Bribery and Anti-Corruption Policy*) as well as all forms of retaliation, discrimination, harassment, intimidation against any person reporting a breach of this policy.

The Company may seek to audit suppliers to ensure they comply with this policy. Such audits will be focused where risks regarding human rights concerns are greatest, such as given the sector and country risk of human rights abuses.

5. HUMAN RIGHTS ASSESSMENT

Where considered appropriate, the Company may undertake human rights assessments for high-risk partners which may include, but not be limited to, high-risk contractors, suppliers, joint ventures and merger and acquisitions targets.

The Company reserves the right to conduct a due diligence process with its current and future suppliers for risk identification in its operations and supply chain. This could include a periodic review of risk mapping of potential issues, country risk, sector risk and specific warnings on products and services (such as those notified through the Australian Border Force, US Department of State, and reputable NGOs including Walk Free (who publish the Global Slavery Index)). The assessment of human rights issues may include all the human rights abuses named in this policy which may include our own employees and supply chain with particular attention for at-risk groups (such as women, children, Indigenous people, migrant workers, third-party contracted labour, local communities and works from regions and sectors with high incidence of known modern slavery and human rights abuses).

6. HUMAN RIGHTS MITIGATION AND REMEDIATION

Human rights abuses will ideally not occur within the Company's operations and supply chain. However, if the Company identifies risks of human rights abuses, or actual violations, it will take appropriate action to mitigate the risk or (where practicable) remediate the harm.

7. REPORTING

The Company will report human rights matters through its annual Sustainability Report. The Company will specifically report modern slavery matters through its annual Modern Slavery Statement.

8. TRAINING

Training on this policy, and specifically the risk of modern slavery in our operations and supply chain, will be delivered to key staff.

9. RESPONSIBILITIES

The Health, Safety and Sustainability Committee is charged with the oversight of the Company's sustainability practices, which includes human rights risks. Within the management team, the Chief Sustainability Officer is responsible for reviewing human rights practices, which includes modern slavery. If an individual is in any doubt regarding human rights matters, they should contact the Chief Sustainability Officer.

10. REVIEW

This policy will be reviewed by the Board annually, to ensure that it continues to reflect the intent and aspirations of the Company in addressing human rights, and to reflect the letter and spirit of all applicable laws and regulations (including the *Modern Slavery Act 2018* (Cth)).

11. ASSOCIATED DOCUMENTS

Anti-Bribery and Anti-Corruption Policy

Sustainability Policy

Health, Safety and Sustainability Committee Charter

Whistleblower Policy

Code of Conduct

Equal Employment Opportunity and Diversity Policy

Review History

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